



# City of Palm Springs

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August 13, 1996

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RESPONSE TO  
THE FOURTH NOTICE OF PROPOSED RULEMAKING  
DOCUMENT No. FCC 96-311  
FCC DOCKET No. 92-297  
PROPOSAL TO DESIGNATE THE 31.0-31.3 GHz BAND FOR LMDS

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City of Palm Springs

FCC 96-311

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

Rulemaking to Amend Parts 1,2,21, and 25  
of the Commission's Rules to Redesignate  
the 27.5-29.5 GHz Frequency Band, to  
Reallocate the 29.5-30.0 GHz Frequency  
Band, to Establish Rules and Policies for  
Local Multipoint Distribution Service and for  
Fixed Satellite Services.

CC Docket No. 92-297

COMMENTS

City of Palm Springs, Palm Springs, California submits the following comments in accordance with the Fourth Notice of Proposed Rulemaking, Section IV-A, "Proposal to designate the 31.0-31.3 GHz band for LMD", of the first Report and Order and Fourth Notice of Proposed Rulemaking of July 17, 1996, which was released for comment on July 22, 1996.

The City of Palm Springs has been informed by various agencies and companies that the FCC will be hearing a ruling regarding the reallocation of frequencies in the 31.0-31.3 GHz band range.

The City of Palm Springs, over the past two years, has been obtaining licensing and installing microwave communications which operate on a band range within the 31.0-31.3 GHz band width. Enclosed you will find our current active microwave radio station licensing for these frequencies. The radio links that the microwave facilities provide are used to supply signal timing and coordination data between our Traffic Management Center and a Citywide Traffic Signal System. This system currently has thirty-five signals with a plan for an additional twenty signals to be added to the system in the next year. The build-out for this system to follow in the next three years is for a total of seventy signals. This signal system does not only provide the City of Palm Springs with an affordable method of communicating between our Traffic Management Center and the Traffic Signal System, but additionally reduces delay, which in turn reduces fuel consumption and of course exhaust emissions into the environment. This system provides a vital link of communication in detecting signal malfunctions so that maintenance personnel can be dispatched to intersections which experience potentially hazardous operating conditions. The use of the 31.0-31.3 GHz short haul point-to-point radio system, as mentioned before, is a cost effective way of communicating between the TMC and the field. If it were not for this technology, the City of Palm Springs would not have been able to afford the installation of this system. The most recent corridor in this system has just been completed at a substantial cost within the past 90 days. The loss of this band width would provided an undue hardship on the City in that we would be forced to disband our communication system. As a county-wide, and even more importantly a state-wide, push for an intelligent transportation system is being sought after by transportation officials, the loss of the microwave communication systems may prove to be devastating. I am sure you are aware, this technology is used for communications of video surveillance systems, traffic counting stations, variable message signs, as well as traffic signal communications. The entire community benefits from this technology being used as it is.

Based on the City of Palm Springs' current implementation, the past implementation of these systems, as well as projects which are currently in the design stages, we strongly urge the FCC to maintain our ability to utilize the 31.0-31.3 GHz band width for the purpose of traffic signal interconnect, coordination and intellegent transportation systems.

Respectfully Submitted,



David J. Barakian  
City Engineer

DJB:RBJ:mcn

cc: David L. Strecker, Director of Public Works  
Richard B. Jenkins, Traffic Assistant

Enclosure